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January 21, 2015

The Honorable Donald H. Steckroth
United States Bankruptcy Court
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, NJ 07102

RE: *PARADIGM EAST HANOVER, LLC*
Case No. 14-25017/DHS
Our Reference: 279263

Dear Judge Steckroth:

We represent EHMP, LLC, holder of a tax lien on property of the debtor located at 11 Mount Pleasant Avenue, Block 99, Lot 4. Please accept this letter in lieu of a more formal response to the Supplement to Motion of Paradigm East Hanover, LLC for the Entry of an Order Authorizing the Debtor to Sell Real Property to Avalonbay Communities, Inc., Free and Clear of Liens, Claims and Interests Pursuant to 11 U.S.C. §363. When the debtor initially filed this motion, it only included Block 99, Lot 4.02. Attached to the motion is a Purchase and Sale Contract between the Debtor, 77 Charters, Inc. and AvalonBay Communities, Inc. for Lot 4.02 only. Now, ten days after filing the motion to approve the sale of Lot 4.02, Debtor files a supplement proposing to sell Lot 4 also, or in the alternative, to conduct an auction on the date of the hearing. Debtor proposes this on short notice to the creditor, and without any agreement of sale, or any advertising and bidding procedures approved by the Court.

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EHMP, LLC does not have sufficient information to approve anything, as debtor has failed to provide concrete information regarding their plan to sell Lot 4. For the foregoing reasons. EHMP, LLC objects to the Supplement to the Motion to Sell.

Very truly yours,

/s/ Linda S. Fossi

LINDA S. FOSSI

LSF/cd

cc: EHMP, LLC
Morris S. Bauer, Esquire
Paradigm East Hanover, LLC